IN THE

Supreme Court of the United States

DONALD J. TRUMP,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF SERVICE

I, Brianne J. Gorod, do hereby declare that on April 8, 2024, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Scholars of Constitutional Law as *Amici Curiae* in Support of Respondent on counsel for each party to the above proceedings as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on April 8, 2024.

Brianne J. Gorod

Brianne J. Foros

Counsel for Amici Curiae